

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,  
LLC, a Delaware limited liability company,

Plaintiff

CA No.: 04-263

v.

JUDGE McLAUGHLIN AND  
MAGISTRATE JUDGE  
SUSAN PARADISE BAXTER

CREDITRON FINANCIAL SERVICES,  
INC, a Pennsylvania corporation, and,  
TELATRON MAKETING GROUP, INC.,  
a Pennsylvania corporation,

TRIAL BY JURY DEMANDED

**Electronically Filed**

Defendants

**CONSENTED TO MOTION TO REVISE  
CASE MANAGEMENT ORDER**

AND NOW, comes the Plaintiff, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., and files the following Consented to Motion to Revise Case Management Order, respectfully representing as follows:

1. This matter involves a contract dispute that was transferred by the U.S. District Court for the District of Delaware to this Honorable Court.
2. On March 10, 2006 this Court entered a Revised Case Management Order which directed that discovery conclude by June 1, 2006.
3. The parties have engaged in significant discovery taking the depositions of six key witnesses, as well as conducting 30(b)(6) depositions. Further, Defendants have issued two third party subpoenas in this matter. Plaintiff served a second set of written discovery.

4. Plaintiff has been attempting to schedule the deposition of Al Covatto over the course of this litigation to no avail and Defendants have not produced Mr. Covatto for deposition to date. Defendants have explained that Mr. Covatto's poor health and recent hospitalizations have rendered him unavailable. Mr. Covatto is a key witness in this matter and has information central to the matters in this case.

5. In addition, during recent depositions, Plaintiff discovered that three additional witnesses, Katherine Lombozzi, Art Kissell and Michael Covatto, have information central to this dispute and need to be deposed.

6. Defendants have requested additional documentation from Plaintiff, including documentation which Plaintiff has refused to produce because Plaintiff contends that the records are proprietary in nature. The Defendants have filed a motion to compel the production of these records.

7. The parties need additional time to facilitate discovery in this matter.

8. Defendant consents to this Motion to Revise Case Management Order.

9. The parties respectfully request that this Honorable Court enter an Order revising the Case Management Order so as to provide an additional thirty (30) days for pretrial discovery and extending all other deadlines accordingly.

WHEREFORE, the parties respectfully request that this Honorable Court issue an Order revising the Case Management Order of March 10, 2006.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

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Dated: May 31, 2006